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July 21, 2017

VIA ECF

The Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

RE: Laspatha DeCaro Studio Corp. v. Rimowa GmbH, et al., No. 16-cv-0934

Dear Judge Schofield:

We represent plaintiff Laspatha DeCaro Studio Corporation (“LD”) in the above-captioned matter. Pursuant to the Third Amended Civil Case Management Plan and Scheduling Order [Dkt. No. 105] (“Scheduling Order”), Plaintiff and defendants Rimowa GmbH, Rimowa Distribution Inc., and Rimowa Inc. (together “Rimowa”), Meiré GmbH & Co. KG d/b/a Meiré and Meiré (“Meiré”) and Shotview Berlin Photographers Management GmbH d/b/a Shotview Artists Management (“Shotview”) respectfully submit the following joint status letter.

Since the last joint status report, dated June 5, 2017 [Dkt. No. 114], the parties have continued to pursue fact discovery and exchange document productions. The parties are engaged in negotiations concerning the scheduling of their respective Rule 30(b)(6) depositions; while depositions of the corporate designees for LD, Rimowa and Meire are expected to be taken during the first two weeks of August 2017, Shotview's designee is not likely to be available prior to the close of fact discovery on August 15, 2017. The parties will continue to confer and update the Court as necessary regarding this matter. With the exception of Shotview's deposition, however, the parties expect that fact discovery will be substantially complete by the current deadline set in the Scheduling Order, August 15, 2017.

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After conferring regarding expert discovery, the parties have reached agreement on the following schedule:

Deadline	Date
Initial Reports	August 31
Rebuttal Reports	September 26
Reply Reports	October 13
Expert Depositions Completed	On or before October 31

At present, the following motions are pending before the Court:

- By Meire: Motion to Dismiss the Cross Claims filed by Defendant Shotview, dated June 29, 2017 [Dkt. No. 125]; and
- By LD: Letter Motion for Local Rule 37.2 Conference, dated July 19, 2017 [Dkt. No. 131].

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Counsel for LD, Rimowa, Meiré, and Shotview are available at the Court's convenience to discuss any of the matters discussed above.

Respectfully Submitted,
Frankfurt Kurnit Klein & Selz P.C.

/s/ Andrew J. Ungberg

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*Attorneys for Plaintiff LaSpata DeCaro
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Cc: All attorneys of record (via ECF)